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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JESSICA COLEMAN, an individual;  
 ALEISHA GOODWIN, an individual;  
 NORAIN PAGDANGANAN, an  
 individual; and RITA REID, an individual;

Plaintiffs,

vs.

ROBERT TELLES, an individual; and  
 CLARK COUNTY, a political subdivision  
 of the State of Nevada;

Defendant.

AND ALL RELATED CLAIMS.

CASE NO: 2:24-CV-00930-APG-MDC

**COUNTER-DEFENDANTS' /**  
**PLAINTIFFS' MOTION EXTEND**  
**DEADLINE TO RESPOND TO**  
**COUNTERCLAIMANT ROBERT**  
**TELLES'S OPPOSITION TO**  
**PLAINTIFFS' MOTION TO DISMISS**  
**COUNTERCLAIMANT / DEFENDANT**  
**ROBERT TELLES'S FIRST AMENDED**  
**COUNTERCLAIM**

(ECF NOS. 56 & 76)

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COME NOW Plaintiffs / Counter-Claimants (hereinafter “Plaintiffs”), by and through their counsel of record, and hereby submit their *Motion Extend Deadline To Respond To Counterclaimant Robert Telles’s Opposition To Plaintiffs’ Motion To Dismiss Counterclaimant / Defendant Robert Telles’s First Amended Counterclaim* (ECF Nos. 56 & 76). This Motion is made and based upon the pleadings and papers on file herein, the Points and Authorities attached hereto, and any argument which the Court may entertain.

## I. INTRODUCTION

Currently before the Court is Counterclaimant / Defendant Robert Telles’s (“Telles”) First Amended Counterclaim (the “Amended Counterclaims”) (ECF No. 51), Plaintiffs’ Motion to Dismiss Telles’s Amended Counterclaims (the “Motion to Dismiss”) (ECF No. 56), and Telles’s Opposition to the same (the “Opposition”) (ECF No. 76). Telles filed his Opposition on Monday, April 14, 2025, rendering Plaintiffs’ reply due on Monday, April 21, 2025. Plaintiffs’ main counsel will be out of jurisdiction from Thursday, April 17, 2025, through Monday, April 21, 2025, and therefore requests additional time to draft and file Plaintiffs’ reply to Telles’s Opposition.

## II. RELEVANT PROCEDURAL HISTORY

On September 18, 2024, Telles filed his original counterclaims against Plaintiffs. *See* ECF No. 31. Telles brought claims against the Plaintiffs for (1) abuse of process, (2) intentional infliction of emotional distress, and (3) civil conspiracy. Plaintiffs moved to dismiss Telles’s counterclaims on October 9, 2024. *See* ECF No. 32. On February 5, 2025, after briefing on the issue was complete, the Court issue an Order Granting in Part Motion to Dismiss Counterclaims (the “Order”). *See* ECF No. 45. Per the Order, Telles’s claims were dismissed, in whole or in part, with leave to amend. *See* ECF No. 45.

Telles filed his Amended Counterclaims on March 4, 2025. *See* ECF No. 51. The Amended Counterclaim brought forth four claims against Plaintiffs: (1) abuse of process, (2) intentional infliction of emotional distress, (3) civil conspiracy, and (4) slander per se. Plaintiffs then filed their Motion to Dismiss on March 18, 2025. *See* ECF No. 56. After being granted an

1 extension to do so, Telles filed his Opposition to Plaintiffs' Motion to Dismiss on April 14, 2025.  
2 See ECF No. 76. Under the current briefing scheduling, Plaintiffs' reply to Telles's Opposition  
3 is due April 21, 2025.

### 4 **III. LEGAL STANDARDS**

5 Fed. R. Civ. P. ("FRCP") 6(b)(1) holds that, when an act must be done within a specified  
6 time, the court may extend the time for good cause if the request for an extension is made before  
7 the original time or its extension expires. The rule should be liberally construed to effectuate the  
8 general purpose of seeing that cases are tried on their merits. *Ahanchian v. Xenon Pictures, Inc.*,  
9 624 F.3d 1253, 1258-59 (9th Cir. 2010). When determining if the good cause standard has been  
10 met, the court focuses on the diligence of the moving party. *Saxana v. Martinez-Hernandez*, 2024  
11 WL 728657, at \*1 (D. Nev. 2024) (citing *Green Aire for Air Conditioning W.L.L. v. Salem*, 2020  
12 WL 58279, at \*3 (E.D. Cal. Jan. 6, 2020) ("Rule 16(b)'s good cause inquiry focuses primarily  
13 on the movant's diligence.")). Additionally, the carelessness of a party is not compatible with a  
14 finding of diligence or grant of relief. *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609  
15 (9th Cir. 1992).

### 16 **IV. LEGAL ARGUMENT**

17 Plaintiffs' Motion to Extend is timely under existing precedents and rules of civil  
18 procedure. The original deadline to file Plaintiffs' reply to Telles's Opposition is April 21, 2025.  
19 The instant motion is filed on Wednesday, April 16, 2025, making it compliant with the  
20 requirements of FRCP 6(b)(1). Additionally, Plaintiffs' have been diligent in filing this request  
21 for an extension as Telles's Opposition was filed on Monday, April 14, 2025. This also supports  
22 the conclusion that Plaintiffs have not been careless in seeking this extension. Finally, allowing  
23 Plaintiffs' an extension of the deadline to reply to Telles's Opposition supports the purpose of  
24 ensuring that the instant case is tried on its merits as it allows Plaintiffs' counsel to thoroughly  
25 review Telles's Opposition and draft a thorough, well-researched reply.

26 The attorney mainly responsible for handling the briefing in this matter, Ms. Jorgensen,  
27 will be out of jurisdiction through Monday, April 21, 2025. Given that the originally anticipated

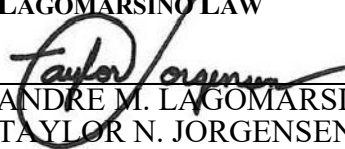
1 deadline to reply was moved as a result the extension given to Telles to file his Opposition, the  
 2 Plaintiffs seek relief from the Court to allow their counsel to produce a thorough reply while  
 3 working around previously scheduled commitments. Specifically, Plaintiffs request that the  
 4 Court extend the deadline to file their reply to Telles's Opposition to Wednesday, April 30, 2025.

5 **V. CONCLUSION**

6 Plaintiffs timely bring this Motion to Extend the current deadline to file their reply to  
 7 Telles's Opposition and respectfully request that the Court approve moving said deadline from  
 8 Monday, April 21, 2025, to Wednesday, April 30, 2025.

9 DATED this 16<sup>th</sup> day of April, 2025.

10 **LAGOMARSINO LAW**

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19 IT IS SO ORDERED:

20 Dated: April 17, 2025

21   
 22 ANDREW P. GORDON  
 23 CHIEF UNITED STATES DISTRICT JUDGE  
 24  
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